

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

Quentin Tyrell Jones

(In the space above enter the full name(s) of the plaintiff(s).)

-against-

Civ. Action No. _____
(To be assigned by Clerk's
Office)

Warden: D. Metzger; Internal
Affairs office; Security Superin-
tendent/Chief etc... All

COMPLAINT
(Pro Se Prisoner)

Jury Demand?

☒ Yes
☐ No

(In the space above enter the full name(s) of the defendant(s).
If you cannot fit the names of all of the defendants in the
space provided, please write "see attached" in the space
above and attach an additional sheet of paper with the full list
of names. The names listed in the above caption must be
identical to those contained in Section IV. Do not include
addresses here.)

NOTICE

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

I. COMPLAINT

Indicate below the federal legal basis for your claim, if known. This form is designed primarily for pro se prisoners challenging the constitutionality of their conditions of confinement, claims which are often brought under 42 U.S.C. § 1983 (against state, county, or municipal defendants) or in a "Bivens" action (against federal defendants).

Check one:

- ☒ 42 U.S.C. § 1983 (state, county, or municipal defendants)
- ☐ Action under *Bivens v. Six Unknown Federal Narcotics Agents*, 403 U.S. 388 (1971) (federal defendants)

II. PLAINTIFF INFORMATION

Jones, Quentin Tyrell Quinton Jones
Name (Last, First, MI) Aliases

00358258
Prisoner ID #

James T. Vaughn Corr. Center
Place of Detention

1181 Paddock RD.
Institutional Address

Smyrna Delaware 19977
County, City State Zip Code

III. PRISONER STATUS

Indicate whether you are a prisoner or other confined person as follows:

- ☐ Pretrial detainee
- ☐ Civilly committed detainee
- ☐ Immigration detainee
- ☒ Convicted and sentenced state prisoner
- ☐ Convicted and sentenced federal prisoner

IV. DEFENDANT(S) INFORMATION

Please list the following information for each defendant. If the correct information is not provided, it could result in the delay or prevention of service. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant 1: D. Metzger
Name (Last, First)
Warden
Current Job Title
J.T.V.C.C 1181 Paddock RD
Current Work Address
Smyrna Del. 19977
County, City State Zip Code

Defendant 2: Doe, John or Doe, Jane
Name (Last, First)
Staff of Internal Affairs office of prison
Current Job Title
J.T.V.C.C 1181 Paddock RD
Current Work Address
Smyrna Del. 19977
County, City State Zip Code

Defendant(s) Continued

Defendant 3: Doe, Jane or Doe, John
Name (Last, First)

Security Chief / Superintendent of prison
Current Job Title

J.T.I.V.C.C 1181 Paddock RD
Current Work Address

Smyrna Del 19977
County, City State Zip Code

Defendant 4: _____
Name (Last, First)

Current Job Title

Current Work Address

County, City State Zip Code

V. STATEMENT OF CLAIM

Place(s) of
occurrence:

(2) Diff. Bldgs. within prison.
J.T.V.C.C. (Prison) - (Delta West (A) Tier) thru (MHU# 22, (A) Tier)
Bldg. Bldg.

Date(s) of occurrence: September "2017" thru January "2018"

State which of your federal constitutional or federal statutory rights have been violated:

Due Process - 4th, 5th, 6th, 8th Amen; 2nd 14th
Amend.

State here briefly the FACTS that support your case. Describe how each defendant was personally involved in the alleged wrongful actions, state whether you were physically injured as a result of those actions, and if so, state your injury and what medical attention was provided to you.

FACTS:

What
happened to
you?

On or about the months Sept. "2017" - Oct. "2017" I was hired within the J.T.V.C.C. - prison facility (Delta West) Bldg. as a (BARBER) and transferred from (B) Tier to the Worker's tier, (A) Tier within the same said building. Furthermore, I was assigned/ placed in cell (A-#17) with I/m. Terrence Teagle "a known Inmate of the prison to set other inmates up! by placing Drugs, Razors, Shanks; or any other Dangerous Contraband within other inmates cells or within their personal belongings". On 11/15/17 I, Quentin T. Jones - 358258 submitted a hand crafted AFFIDAVIT: Signed, Dated, and Notarized to the "Internal Affairs office" within the prison facility stating that "Inmates were using some plastic object to break in other inmates cells," And that I was informed by other inmates to watch myself while being around a specific group of inmates; because they were conspiring to set me up! by placing Drugs or some sort of Dangerous Contraband on me".

To have me terminated from my employment as the (BARBER) of Delta-West Bldg.

WHAT
HAPPENED
TO YOU?

Also ... I informed multiple Staff of D.O.C of the Issues prior to being set up! by Specific Inmates: Terrence Teagle and Anthony Abbatiello, by secretly placing a "RAZOR" that was in the form of a SHANK in my left shoe. On 11/27/17 during the 8am - 4pm shift of SGT. Aspinall being OIC, Inmates: Terrence Teagle and Anthony Abbatiello conspired together in placing Dangerous Contraband within my personal belongings (left shoe). Afterwards, C/O's: Wooleyhan and Barnes were ordered to strip search me for a second time; in-which resulted in C/O: Wooleyhan precurring a "RAZOR" out of my left shoe. I was then served a Disciplinary referral, and told by C/O: Wooleyhan that I may be terminated from my job! pending the referral. On 11/28/17 I had a Disciplinary Hearing with LT. Stevens of J.T.V.C.C.; along with C/O: Nelson which found me NOT Guilty!! due to the FACT that C/O: Nelson could confirm my statements of me informing her prior of the behavior of both Inmates. Afterwards, I was removed from Cell (A-17) with Terrence Teagle and assigned to Cell (A-1) of the same said Tier. I have also submitted (#584 forms) Grievances on the above events. On 11/29/17 I was informed by I/m: Anthony Abbatiello of Delta West (A) Tier that I/m: Terrence Teagle would "Pop Open" my locker box, and read through my crim. Case documents while I was absent from the tier (working as BARBER). I then proceeded to speak with the OIC on 8am-4pm shift, CPL. Stanford in-which he CPL. Stanford submitted an email to LT. TILGHMAN of Delta West bldg. A Grievance was submitted on this Issue.

(Del. Rev. 11/14) Pro Se Prisoner Civil Rights Complaint

Who did
what?

During the Month of December 2017 - Jan. 2018 I observed and recognized that my original Probable Cause Sheet & Police Investigative Report Sheet pgs. 4-5 were torn away from its packet. I then Submitted a grievance on this Issue and spoke with LT. PARSONS and Counselor: Stevens of MHU# 22 Bldg. Month(s) prior to the above date I was informed by I/m: Anthony Abbatiello of Delta West(A) that I/m: Terrence Teagle would "pop open" my locker Box and read through my crim. Case documents! While I was absent from the tier. Throughout the month(s) of October - November 2017 I observed I/m's: Kamilla London, Terrence Teagle and Anthony Abbatiello set several inmates up! throughout the Delta West(A) tier with the prison by placing Drugs, Razors, and SHANKS... etc... within other inmates cells to have them terminated from their jobs!. I/m's that have been set up! in the past are: Jeffery Layton, Deceased I/m: Robert Martin, Clifford Wright and including myself. Several inmates been subjected to Disciplinary referrals and moved from their original classifications, due to the behaviors of other inmates. "Inmates Kamilla London, Terrence Teagle and Anthony Abbatiello are known throughout the prison facility to set inmates up!, even if the cost is to make up! a story against another inmate." During the month(s) middle of December 2017 - Beginning January 2018, I was informed by I/m: Terrence Teagle that I/m: Anthony Abbatiello stole my crim. Case Paperwork, and Submitted a hand written letter to the Sussex County Superior Court, Prothonotary's office, Judge, and or prosecution of my Case; in the hopes of

Continuence →

receiving a benefit from the state for a fabrication of testimony against me.

Also... There was a grievance submitted on the issue.

WHO DID
WHAT?

Furthermore, during the month of December 2017 Inmate Terrence Teagle left outside of the prison facility with staff officials, and arrived at G.T.F office in Dover, Delaware to communicate about events that have taken place on Delta West (A)-tier.

Also... I hold in my possession a Hand written Statement from Inmate Terrence Teagle that he would go to G.T.F office - Governor's Task Force/Dover DE and speak to them about past events of Delta West (A); In exchange for an early release from his prison incarceration sentence.

The Dept. of Corrections, and its staff did not take the adequate steps to remedy all issues until there was an incident on 01/14/18 where inmates Terrence Teagle and Anthony Abbatiello got into a physical altercation; which resulted in Inmate Anthony Abbatiello hitting Terrence Teagle in the head with a "lock-in a sock" utilized as a weapon. Afterwards,

Inmate Terrence Teagle was transferred to Sussex Corr. Institution in Georgetown, Delaware 19947, where his wishes were accommodated by staff of D.O.C.

All information pertaining to these contents were documented by Complainant, and sent to the Sussex County Superior Court (prothonotary's office) for complaints files/records.

Was anyone
else
involved?

The Dept. of Corr., and its Staff are Utilizing Inmates to seek out information; In-regards to other Inmates In-exchange for Job! opportunities Within the prison @ J.I.T.V.C.C 1181 Paddock Rd. Smyrna Del. 19977

The Conduct of staff Utilizing these Inmates for Seeking Information is very detrimental; because it Jeopardizes Inmates lives; along with staff's.

* All Inmates who were involved in being set up! are; Jeffery Layton, Clifford Wright, Deceased Inmate Robert Martin who documented all events to his attorney, and including myself.

Staff who were made aware during its early month of November 2017 are; C/O: Barnes; C/O: Woolleyhan; C/O: Nelson; CPL. Stanford; CPL. Puzzo; LT. Stevens; LT. PARSONS; Staff LT. Sennett, WARDEN, Security Chief/ Superintendent;; SGT. Aspinall

(2) Hand crafted AFFIDAVITS sent to administration by Complaint on 11/15/17 and 12/03/17 Requesting staff of (IA) office to forward letter to WARDEN, Staff LT. Sennett, and acting Security officer /chief.

Dates of grievances filed: 11/15/17; 11/29/17; 12/03/17; 01/13/18

Also... I hold in possession a Affidavit written by F/m: Anthony Abbatiello dated for 12/28/17 and Notorized that he would testify truthfully under the penalty of perjury.

at any proceeding to the FACTS of the
Information that Inmate Terrence Teagle
Supplied him with.

WAS ANYONE
ELSE
INVOLVED?

Furthermore, I documented Information
and sent it to Counselor: Stevens of the
MHU #22 Bldg. during the month January 2018,
— All Info!

Consisted of chronological order of events of me
being Set up! by I/M: Terrence Teagle and
Anthony Abbateello; along with my crim. case
documents being stolen.

Counselor Stevens stated to me that her
Boss Documented all Information that I
sent during the month of January 2018.

VI. ADMINISTRATIVE PROCEDURES

WARNING: Prisoners must exhaust administrative procedures before filing an action in federal court about prison conditions. 42 U.S.C. § 1997e(a). Your case may be dismissed if you have not exhausted your administrative remedies.

Is there a grievance procedure available at your institution?

☒ Yes ☐ No

Have you filed a grievance concerning the facts relating to this complaint?

☒ Yes ☐ No

If no, explain why not:

Is the grievance process completed?

☐ Yes ☒ No

If no, explain why not:

Grievances that I submitted in-reference to these issues have been Unprocessed. (I cannot explain why?) but all have been Up-processed.

VII. RELIEF

State briefly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

That I am transferred back to the Sussex Corr. Institution (P.O. Box 500 Georgetown, Delaware 19947), And Or Assigned to the (SI) Building of the J.T.V.C.C 1181 Paddock Rd. Smyrna, Delaware 19977 (Single Cell) where I am able to Continue Working on my Crim. Conviction Case.

(Del. Rev. 11/14) Pro Se Prisoner Civil Rights Complaint

VIII. PRISONER'S LITIGATION HISTORY

The "three strikes rule" bars a prisoner from bringing a civil action or an appeal in forma pauperis in federal court if that prisoner has "on three or more occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury." 28 U.S.C. §1915(g).

Have you brought any other lawsuits in state or federal court while a prisoner? ☒ Yes ☐ No

If yes, how many? II

Number each different lawsuit below and include the following:

- Name of case (including defendants' names), court, and docket number
- Nature of claim made
- How did it end? (For example, if it was dismissed, appealed, or is still pending, explain below.)

* 1st Claim Case: DENIED w/ PREJUDICE
 • DEL. STATE POLICE STATION, et al,
 CA. NO. 1:16-CV-00128-LPS
 - Due Process Claim - (District Court) Delaware

* 2nd Claim Case: DENIED w/o PREJUDICE in PART
 Dept. of CORR.
 LT. RAE MORGAN, SGT. BARRY BILES (State Court) Delaware
 Superior Ct.
 - RETALIATION CLAIM -
 C.A. NO. S17M-09-009 THG

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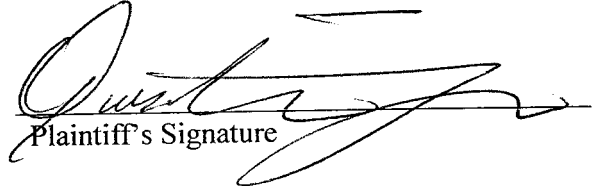
IX. PLAINTIFF'S DECLARATION AND WARNING

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending or modifying existing law; and (3) complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Plaintiff must sign and date the complaint and provide prison identification number and prison address.

02/04/18
Dated


Plaintiff's Signature

Jones, Quentin Tyrell
Printed Name (Last, First, MI)

00358258
Prison Identification #

J. T. V. C. C.
1181 Paddock RD. Smyrna Delaware 19977
Prison Address City State Zip Code

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

Attachment:

February 4, 2018

Information that may be needed:

SSI# 3884

Quentin Tyrell
Jones

D.O.B (1983)

No! account #'s

* last 4 digits of SSI#

* Birth year

* full name

Thank you!

Quentin T. Jones